

# EXHIBIT 10

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**From:** Ben-Jacob, Michael <Michael.Ben-Jacob@kayescholer.com>  
**Sent:** Wednesday, December 7, 2016 11:48 PM  
**To:** 'alenczner@litigate.com'  
**Cc:** 'John van Merkensteijn'; 'Steven Donziger'  
**Subject:** Instructions for Canadian counsel/Ecuador matter  
  
**Categories:** KF2

Alan,

This confirms that Steven is authorized to give instructions to you regarding the allocation and disbursement of funds to counsel to pay legal fees.

Regards.

mbj

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